



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105-3901

November 5, 2020

Mr. Ravi Ramalingam, Chief
Consumer Products and Air Quality Assessment Branch
Air Quality Planning and Science Division
California Air Resources Board
P.O. Box 2815
Sacramento, California 95812

Dear Mr. Ramalingam:

Thank you for your submission of the California Air Resources Board (CARB) *Annual Network Plan Covering Monitoring Operations in 25 California Air Districts, July 2020* ("Plan") on July 10, 2020. We have reviewed the submitted document based on the requirements set forth in 40 CFR Part 58. Based on the information provided in the plan, the U.S. Environmental Protection Agency (EPA) approves all portions of the network plan except those specifically identified below. With this plan approval, we also formally approve the sampling waiver renewal request for 1:6 day sampling for five PM_{2.5} sites: Colusa (AQS ID: 06-011-1002), Lakeport (AQS ID: 06-033-3002), Roseville (AQS ID: 06-061-0006), Redding (AQS ID: 06-089-0004), and Woodland (AQS ID: 06-113-1003), and O₃ season waivers for six O₃ sites: Echo Summit (AQS ID: 06-017-0012), Cool (AQS ID: 06-017-0020), Jerseydale (AQS ID: 06-043-0006), White Cloud Mountain (AQS ID: 06-057-0007), Sutter Buttes (AQD ID: 06-101-0004), and Tuscan Butte (AQS ID: 06-103-0004) for November 2020-March 2021. Please note that an updated request including 2020 data will be required for future ozone season waiver approvals after March 31, 2021. More information about these approvals is included in enclosure A.

In the State of California, ten district monitoring agencies submitted annual monitoring network plans this past year in accordance with 40 CFR 58.10. EPA received plans covering the 2018 calendar year from:

- Bay Area Air Quality Management District,
- Great Basin Unified Air Pollution Control District,
- Monterey Bay Air Resources District,
- North Coast Unified Air Pollution Control District,
- Sacramento Metropolitan Air Quality Management District,
- Santa Barbara County Air Pollution Control District,
- San Diego County Air Pollution Control District,
- San Joaquin Valley Air Pollution Control District,
- San Luis Obispo County Air Pollution Control District, and
- South Coast Air Quality Management District.

EPA has reviewed and approved all of the monitoring agency plans listed above with the exception of the Sacramento Metropolitan Air Quality Management District plan, which was submitted late.¹ EPA has provided specific comments on all other plans we received from California local agencies through separate letters and have forwarded these to CARB. Please refer to these responses for additional comments pertinent to CARB's network.

Please note that we cannot approve portions of the annual network plan for which the information in the plan is insufficient to judge whether the requirement has been met, or for which the information provided does not meet the requirements as specified in 40 CFR 58.10 and the associated appendices. EPA Region 9 also cannot approve portions of the plan for which the EPA Administrator has not delegated approval authority to the regional offices. Enclosure A (*A. Annual Monitoring Network Plan Checklist*) is the checklist EPA used to review your plan for items that are required to be included in the annual network plan along with our assessment of whether the plan submitted by your agency addresses those requirements. Items highlighted in yellow are those EPA Region 9 is not acting on, as we either lack the authority to approve the specific item, or we have determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met. Items highlighted in green in enclosure A require attention in order to improve next year's plan.

All comments conveyed via this letter and enclosures should be addressed prior to submittal of next year's annual monitoring network plan to EPA.

If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 947-4134 or Dena Vallano (415) 972-3134.

Sincerely,

Gwen Yoshimura, Manager
Air Quality Analysis Office

Enclosures:

- A. Annual Monitoring Network Plan Checklist
- B. Elements Related to CARB Sites in Local Agency Plans where EPA is Not Taking Action

cc (via email): Jin Xu, CARB
Manisha Singh, CARB
Kathy Gill, CARB
Michael Miguel, CARB

¹ EPA received Sacramento Metropolitan Air Quality Management District's *2020 Annual Monitoring Network Plan* on September 22, 2020. EPA's review is forthcoming and is not included in Enclosure B due to the late submittal. EPA will copy CARB on our response to the Sacramento Metropolitan Air Quality Management District's *2020 Annual Monitoring Network Plan*. Please refer to this upcoming response for additional comments pertinent to CARB's network.

Michael Werst, CARB
Sylvia Vanderspek, CARB
Laura Carr, CARB
Ranjit Bhullar, CARB

A. ANNUAL MONITORING NETWORK PLAN CHECKLIST

(Updated April 8, 2020)

Year: 2020

Agency: California Air Resources Board (CARB)

40 CFR 58.10(a)(1) requires that each Annual Network Plan (ANP) shall provide for the documentation of the establishment and maintenance of an air quality surveillance system that consists of a network of SLAMS monitoring stations that can include FRM, FEM, and ARM monitors that are part of SLAMS, NCore, CSN, PAMS, and SPM stations.

40 CFR 58.10(a)(1) further directs that, “The plan shall include a statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E of this part, where applicable. The Regional Administrator may require additional information in support of this statement.” On this basis, review of the ANPs is based on the requirements listed in 58.10 along with those in Appendices A, C, D, and E.

EPA Region 9 will not take action to approve or disapprove any item for which Part 58 grants approval authority to the Administrator rather than the Regional Administrators, but we will do a check to see if the required information is included and correct. The items requiring approval by the Administrator are: NCore, and Speciation (STN/CSN).

Please note that this checklist summarizes many of the requirements of 40 CFR Part 58, but does not substitute for those requirements, nor do its contents provide a binding determination of compliance with those requirements. The checklist is subject to revision in the future and we welcome comments on its contents and structure.

Key:

White	meets the requirement
Yellow	requirement is not met, or information is insufficient to make a determination. Action requested in next year’s plan or outside the ANP process.
Green	item requires attention in order to improve next year’s plan.

	ANP requirement	Citation within 40 CFR 58 ²	Was the information submitted? ³ If yes, section or page #s.	Does the information provided ⁴ meet the requirement? ⁵	Notes
GENERAL PLAN REQUIREMENTS					
1.	Submit plan by July 1 st	58.10 (a)(1)	Y, cover letter	N	Plan submitted on July 10, 2020
2.	30-day public comment / inspection period	58.10 (a)(1); 58.10 (c)	Y, cover letter, p.1, and App E	Y	
3.	Statement of whether the operation of each monitor meets the requirements of appendices A, B, C, D, and E, where applicable	58.10 (a)(1)	Y, p. 1	Y	
4.	Modifications to SLAMS network – case when we are not approving system modifications	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	NA	NA	CARB submitted a request on July 1, 2020, to discontinue CO and NO ₂ at the Santa Maria site (AQS ID: 06-083-1008). In that CARB will be resubmitting this request, review of this modification is on hold. Please coordinate with EPA on anticipated system modifications that were in progress when the plan was written.
5.	Modifications to SLAMS network – case when we are approving system modifications per 58.14	58.10 (a)(2); 58.10 (b)(5); 58.10 (e); 58.14	Y, p. 47-48, App C	Y	See Row 26 for EPA's response on CARB's PM _{2.5} sampling frequency waiver renewal request.
6.	Does plan include documentation (e.g., attached approval letter) for system modifications that have been approved since last ANP approval?		Y, App D	N, in some instances	Please include documentation of the following in next year's plan. This is a repeat comment from last year: <ul style="list-style-type: none"> CARB's request and EPA's June 2017 approval of the discontinuation of CO and NO_x monitoring at the Armory site CARB's request and EPA's June 20, 2017 approval of discontinuation of CO monitoring at the El Centro site

² Unless otherwise noted.

³ Response options: NA (Not Applicable), Yes, No, or Incomplete.

⁴ Assuming the information is correct.

⁵ Response options: NA (Not Applicable) – [reason], Yes, No, Insufficient to Judge, or Incorrect

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
7.	Any proposals to remove or move a monitoring station within a period of 18 months following plan submittal	58.10 (b)(5)	Y, p. 47-48	Y	<p>CARB is considering the following system modifications:</p> <ul style="list-style-type: none"> • Relocation of Paradise-Theater/Airport monitoring sites • Relocation of Mojave monitoring site • Relocation of Placerville monitoring site • Discontinuation of PM₁₀ monitoring at Anderson-North and Shasta Lake monitoring sites • Discontinuation of O₃ monitoring at Healdsburg-Airport monitoring site • Relocation of Stockton-Hazelton monitoring site • Potential shutdown of White Cloud Mountain monitoring site <p>CARB is also planning to discontinue operation of the collocated PM_{2.5} and PM₁₀ BAM-2020 units and the collocated PM_{2.5} sampler at the Fresno-Garland site. Upon initial read of the proposed changes, EPA notes potential impacts to meeting 40 CFR 58 Appendix D NCore requirements.</p> <p>Please work with EPA to ensure that any such system modifications are performed appropriately.</p>
8.	Precision/Accuracy reports submitted to AQS	58.16 (a)	Y, p. 46	Y	The plan states that audit results are submitted to AQS quarterly
9.	Annual data certification submitted	58.15	Y, p. 46	Y	Submitted on August 12, 2019
10.	Statement that SPMs operating an FRM/FEM/ARM that meet Appendix E also meet either Appendix A or an approved alternative. Documentation for any Appendix A	58.11 (a)(2)	Y, p. 11	Y	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
	approved alternative should be included. ⁶				
11.	SPMs operating FRM/FEM/ARM monitors for over 24 months are listed as comparable to the NAAQS or the agency provided documentation that requirements from Appendices A, C, or E were not met. ⁷	58.20 (c)	NA	NA	In 2019, no SPM monitors were operating >24 months in the area covered by this ANP. The Redding PM _{2.5} FEM SPM monitor started operating on February 23, 2019.
12.	For agencies that share monitoring responsibilities in an MSA/CSA: this agency meets full monitoring requirements or an agreement between the affected agencies and the EPA Regional Administrator is in place	App D 2(e)	Y, p. 15	Y	

GENERAL PARTICULATE MONITORING REQUIREMENTS (PM₁₀, PM_{2.5}, Pb-TSP, Pb-PM₁₀)

13.	Designation of a primary monitor if there is more than one monitor for a pollutant at a site.	App. A 3.2.3	Y, App A	Y	
14.	Distance between QA collocated monitors. For low volume PM instruments (flow rate < 200 liters/minute) > 1 m. For high volume PM instruments (flow rate > 200 liters/minute) > 2m. [Note: waiver request or the date of previous waiver approval must be included if the distance deviates from requirement.]	App. A 3.2.3.4 (c) and 3.3.4.2 (c)	Y, p. 39, App A	Y	

PM_{2.5} –SPECIFIC MONITORING REQUIREMENTS

15.	Document how states and local agencies provide for the review of changes to a PM _{2.5} monitoring network that impact the location of a violating PM _{2.5} monitor.	58.10 (c)	Y, p. 18	Insufficient to judge	As commented last year, in future plans, please also include language specifically addressing the requirement set forth in 40 CFR 58.10(c) (e.g., note that this applies to review of changes to a PM _{2.5} network, including violating PM _{2.5} monitors).
16.	Identification of any PM _{2.5} FEMs and/or ARMs not eligible to be compared to the NAAQS due	58.10 (b)(13) 58.11 (e)	NA	NA	

⁶ Alternatives to the requirements of appendix A may be approved for an SPM site as part of the approval of the annual monitoring plan, or separately.

⁷ This requirement only applies to monitors that are eligible for comparison to the NAAQS per 40 CFR §§58.11(e) and 58.30.

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
	to poor comparability to FRM(s) [Note 1: must include required data assessment.] [Note 2: Required SLAMS must monitor PM _{2.5} with NAAQS-comparable monitor at the required sample frequency.]				
17.	Minimum # of monitoring sites for PM _{2.5} [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D 4.7.1(a) and Table D-5	Y, p. 32-33, Table 20	Y	Recent Santa Rosa MSA population estimates have been over 500,000, which would affect the number of required sites for the MSA.
18.	Requirements for continuous PM _{2.5} monitoring (number of monitors and collocation)	App. D 4.7.2	Y, p. 34, App A	N, in one instance	The Redding MSA is not currently operating a required continuous PM _{2.5} FEM analyzer. The District began operating an FEM as a special study monitor on February 23, 2019, but does not currently report the data to AQS. The District will keep the FRM as the official monitor while parallel monitoring is being conducted.
19.	FRM/FEM/ARM PM _{2.5} QA collocation	App. A 3.2.3	Y, p. 41-42	Y	
20.	PM _{2.5} Chemical Speciation requirements for official STN sites	App. D 4.7.4	Y, p. 38	Y	
21.	Identification of sites suitable and sites not suitable for comparison to the annual PM _{2.5} NAAQS as described in Part 58.30	58.10 (b)(7)	Y, p. 36, App A	Y	
22.	Required PM _{2.5} sites represent area-wide air quality	App. D 4.7.1(b)	Y, p. 32	Y	
23.	For PM _{2.5} , within each MSA, at least one site at neighborhood or larger scale in an area of expected maximum concentration	App. D 4.7.1(b)(1)	Y, p. 33, Table 20	Y	
24.	If additional SLAMS PM _{2.5} is required, there is a site in an area of poor air quality	App. D 4.7.1(b)(3)	NA	NA	
25.	States must have at least one PM _{2.5} regional background and one PM _{2.5} regional transport site.	App. D 4.7.3	Y, p. 37, App A	Y	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
26.	Sampling schedule for PM _{2.5} - applies to year-round and seasonal sampling schedules (note: date of waiver approval must be included if the sampling season deviates from requirement)	58.10 (b)(4); 58.12(d); App. D 4.7	Y, p. 35-36, App C	Y	On July 10, 2020 CARB submitted a sampling waiver renewal request for five PM _{2.5} sites: (Colusa (06-011-1002), Roseville (06-061-0006), Redding (06-089-0004), Lakeport (06-033-3002), and Woodland (06-113-1003). EPA approves this waiver request for all five sites.
27.	Frequency of flow rate verification for automated and manual PM _{2.5} monitors	App. A 3.2.1	Y, p. 45, App A	Y	
28.	Dates of two semi-annual flow rate audits conducted in the previous CY for PM _{2.5} monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.2.2	Y, App A	Y	

PM₁₀ –SPECIFIC MONITORING REQUIREMENTS

29.	Minimum # of monitoring sites for PM ₁₀ [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App. D, 4.6 (a) and Table D-4	Y, p. 29-30, Table 17	Y	Some recent Santa Rosa MSA population estimates have been over 500,000, which would affect the number of required sites for the MSA. Table 17 notes that certain sites were impacted by wildfire smoke in 2018 that may affect minimum monitoring requirements in these MSAs. Please work with EPA to ensure that minimum monitoring requirements continue to be met in the future.
30.	Manual PM ₁₀ method collocation (note: continuous PM ₁₀ does not have this requirement)	App. A 3.3.4	Y, p. 42, App A	Y	
31.	Sampling schedule for PM ₁₀	58.10 (b)(4); 58.12(e); App. D 4.6	Y, p. 31, App A	Y	
32.	Frequency of flow rate verification for	App. A 3.3.1 and	Y, p. 45, App A	Y	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
	automated and manual PM ₁₀ monitors	3.3.2			
33.	Dates of two semi-annual flow rate audits conducted in the previous CY for PM ₁₀ monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App. A 3.3.3	Y, App A	Y	

Pb –SPECIFIC MONITORING REQUIREMENTS

34.	Minimum # of monitors for non-NCore Pb [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.5	NA, p. 28	NA	
35.	Pb collocation: for non-NCore sites	App A 3.4.4 and 3.4.5	NA, p. 28	NA	
36.	Any source-oriented Pb site for which a waiver has been granted by EPA Regional Administrator	58.10 (b)(10)	NA, p. 28	NA	
37.	Any Pb monitor for which a waiver has been requested or granted by EPA Regional Administrator for use of Pb-PM ₁₀ in lieu of Pb-TSP	58.10 (b)(11)	NA, p. 28	NA	
38.	Designation of any Pb monitors as either source-oriented or non-source-oriented	58.10 (b)(9)	NA, p. 28	NA	
39.	Sampling schedule for Pb	58.10 (b)(4); 58.12(b); App A 3.4.4.2 (c) and 3.4.5.3 (c)	NA, p. 28	NA	
40.	Frequency of flow rate verification for Pb monitors audit	App A 3.4.1 and 3.4.2	NA, p. 28	NA	
41.	Dates of two semi-annual flow rate audits conducted in the previous CY for Pb monitors [Note: 5 -7 month interval is recommended but not a requirement.]	App A 3.4.3	NA, p. 28	NA	

GENERAL GASEOUS MONITORING REQUIREMENTS

42.	Frequency of one-point QC check (gaseous)	App. A 3.1.1	NA, p. 28	NA	
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	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
43.	Date of Annual Performance Evaluation (gaseous) conducted in the previous CY	App. A 3.1.2	NA, p. 28	NA	

O₃ –SPECIFIC MONITORING REQUIREMENTS

44.	Minimum # of monitoring sites for O ₃ [Note 1: should be supported by MSA ID, MSA population, DV, # monitoring sites, and # required monitoring sites] [Note 2: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.] [Note 3: monitors that do not meet traffic count/distance requirements to be neighborhood or urban scale (40 CFR Appendix E, Table E-1) cannot be counted towards meeting minimum monitoring requirements]	App D 4.1(a) and Table D-2	Y, p. 19-21	Y	
45.	Identification of maximum concentration O ₃ site(s)	App D 4.1 (b)	Y, p. 19-21	Y	
46.	Sampling season for O ₃ (Note: Waivers must be renewed annually. EPA expects agencies to submit re-evaluations of the relevant data each year with the ANP. EPA will then respond as part of the ANP response.)	58.10 (b)(4); App D 4.1(i)	Y, p. 22, App A, App B		Please note that an updated waiver request, including 2020 data, will be required for future ozone season waiver approvals after March 31, 2021.
47.	An Enhanced Monitoring Plan for O ₃ , if applicable, no later than October 1, 2019 or two years following the effective date of a designation to a classification of Moderate or above O ₃ nonattainment, whichever is later.	58.10 (a)(11); App D 5 (h)	Y, p. 39-40	N	CARB submitted their ENP on Nov. 26, 2019.

NO₂ –SPECIFIC MONITORING REQUIREMENTS

48.	Minimum monitoring requirements for area-wide NO ₂ monitor in location of expected highest NO ₂ concentrations representing neighborhood or larger scale	App D 4.3.3	NA, p. 23	NA	
49.	Minimum monitoring requirements for susceptible and vulnerable populations	App D 4.3.4	NA, p. 25	NA	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
	monitoring (aka RA40) NO ₂				
50.	Identification of required NO ₂ monitors as either near-road, area-wide, or vulnerable and susceptible population (aka RA40)	58.10 (b)(12)	NA, p. 23-25	NA	
NEAR ROADWAY – SPECIFIC MONITORING REQUIREMENTS					
In CBSAs ≥ 2.5 million, the following near-roadway minimum monitoring requirements apply:					
51.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	NA, p. 23-24	NA	
52.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA, p. 26	NA	
53.	One PM _{2.5} monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	NA, p. 32	NA	
In CBSAs ≥ 1 million and AADT ≥ 250K, the following near-roadway minimum monitoring requirements apply:					
54.	Two NO ₂ monitors	App. D 4.3.2(a); 58.13(c)(3) and (4)	NA, p. 23-24	NA	
55.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA, p. 26	NA	
56.	One PM _{2.5} monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	NA, p. 32	NA	
In CBSAs ≥ 1 million and ≤ 2.5 million AND AADT < 250K, the following near-roadway minimum monitoring requirements apply:					
57.	One NO ₂ monitor	App. D 4.3.2(a); 58.13(c)(3)	NA, p. 23-24	NA	
58.	One CO monitor	App. D 4.2.1(a); 58.13(e)(2)	NA, p. 26	NA	
59.	One PM _{2.5} monitor	App. D 4.7.1(b)(2); 58.13(f)(2)	NA, p. 32	NA	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
SO₂ –SPECIFIC MONITORING REQUIREMENTS					
60.	Minimum monitoring requirements for SO ₂ based on PWEI and/or RA required monitors under Appendix D 4.4.3 [Note: Only monitors considered to be required SLAMs are eligible to be counted towards meeting minimum monitoring requirements.]	App D 4.4	NA, p. 27	NA	
61.	Monitors used to meet Data Requirements Rule	51.1203(c)	NA, p. 27	NA	
NCORE –SPECIFIC MONITORING REQUIREMENTS					
62.	NCore site and all required parameters operational: year-round O ₃ , SO ₂ , CO, NO _y , NO, PM _{2.5} mass, PM _{2.5} continuous, PM _{2.5} speciation, PM _{10-2.5} mass, resultant wind speed at 10m, resultant wind direction at 10m, ambient temperature, relative humidity. NO _y waiver, if applicable.	App. D 3(b)	NA, p. 39	NA	
63.	A plan for making Photochemical Assessment Monitoring Stations (PAMS) measurements, if applicable. The plan shall provide for the required PAMS measurements to begin by June 1, 2021.	58.10 (a)(10); 58.13 (h)	Y, p. 39-40	Y	
SITE OR MONITOR - SPECIFIC REQUIREMENTS (OFTEN INCLUDED IN DETAILED SITE INFORMATION TABLES)					
64.	AQS site identification number for each site	58.10 (b)(1)	Y, App A	Y	
65.	Location of each site: street address and geographic coordinates	58.10 (b)(2)	Y, App A	Y	
66.	MSA, CBSA, CSA or other area represented by the monitor	58.10 (b)(8)	Y, App A	Y	
67.	Parameter occurrence code for each monitor	Needed to determine if other requirements (e.g.,	Y, App A	Y	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
		min # and collocation) are met			
68.	Basic monitoring objective for each monitor	App D 1.1; 58.10 (b)(6)	Y, App A	Y	
69.	Site type for each monitor	App D 1.1.1	Y, App A	Y	
70.	Monitor type for each monitor, and Network Affiliation(s) as appropriate	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, App A	Insufficient to judge, in certain instances	Table 5 lists Jerseydale and Tuscan Buttes with the Monitor Type SPM, while the App A site tables list the Monitor Type as SLAMS. Please clarify in next year's plan.
71.	Scale of representativeness for each monitor as defined in Appendix D	58.10(b)(6); App D	Y, App A	Y	
72.	Parameter code for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, App A	Y	
73.	Method code and description (e.g., manufacturer & model) for each monitor	58.10 (b)(3); App C 2.4.1.2	Y, App A	Y	
74.	Sampling start date for each monitor	Needed to determine if other requirements (e.g., min # and collocation) are met	Y, App A	Y	
75.	Distance of monitor from nearest road	App E 6	Y, App A	Y	
76.	Traffic count of nearest road	App E	Y, App A	Y	
77.	Groundcover	App E 3(a)	Y, App A	Y	
78.	Probe height	App E 2	Y, App A	Y	
79.	Distance from supporting structure (vertical and horizontal, if applicable, should be provided)	App E 2	Y, App A	Y	
80.	Distance from obstructions on roof (horizontal	App E 4(b)	Y, App A	Y	

	ANP requirement	Citation within 40 CFR 58²	Was the information submitted?³ If yes, section or page #s.	Does the information provided⁴ meet the requirement?⁵	Notes
	distance to the obstruction and vertical height of the obstruction above the probe should be provided)				
81.	Distance from obstructions not on roof (horizontal distance to the obstruction and vertical height of the obstruction above the probe should be provided)	App E 4(a)	Y, App A	Y	
82.	Distance from the drip line of closest tree(s)	App E 5	Y, App A	Y	
83.	Distance to furnace or incinerator flue	App E 3(b)	Y, App A	Y	
84.	Unrestricted airflow (expressed as degrees around probe/inlet or percentage of monitoring path)	App E, 4(a) and 4(b)	Y, App A	Y	
85.	Probe material (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, App A	Y	
86.	Residence time (NO/NO ₂ /NO _y , SO ₂ , O ₃ ; For PAMS: VOCs, Carbonyls)	App E 9	Y, App A	Y	

Public Comments on Annual Network Plan

Were comments submitted to the S/L/T agency during the public comment period?	No, Appendix E
Were comments included in ANP submittal?	NA
Were any of the comments substantive? If yes, which ones? If comments were not substantive provide rationale.	NA
Were S/L/T responses to substantive comments included in ANP submittal?	NA
Were the S/L/T responses to substantive comments adequate?	NA
Do the substantive comments require separate EPA response (i.e., agency response wasn't adequate)?	NA
Are the sections of the annual network plan that received substantive comments approvable after consideration of comments? If yes, provide rationale	NA

B. Elements Related to CARB Sites in Local Agency Plans where EPA is Not Taking Action

We are not acting on the portions of annual network plans where either EPA Region 9 lacks the authority to approve specific items of the plan, or EPA has determined that a requirement is either not met or information in the plan is insufficient to judge whether the requirement has been met.

- EPA identified items in the following annual monitoring network plan where a requirement was not being met or information in the plan was insufficient to judge whether the requirement was being met based on 40 CFR 58.10 and the associated appendices. Therefore, we are not acting on the following items:

Item	Checklist Row	Issue
Distance of monitor from nearest road	Santa Barbara, 75	Not meeting requirement in one instance
Minimum # of monitoring sites for PM ₁₀	SJV, 29	Not meeting requirement in some instances
Dates of two semi-annual flow rate audits	SJV, 33	Not meeting requirement in one instance
Date of Annual Performance Evaluation (gaseous) conducted in previous CY	SJV, 43	Not meeting requirement in one instance
Distance from trees	SJV, 82	Not meeting requirement

In addition, the following comments were made in EPA's annual network plan approval letters for the following agencies:

San Joaquin Valley Air Pollution Control District:

- [Item 7] EPA Region 9 is not taking action on the Type 3 PAMS site requirement for the Bakersfield MSA. Upon resolution of issues noted on p. 12-13 of the plan, EPA Region 9 will work with SJVAPCD on this proposed modification to the PAMS network.

CARB is planning to shut down the Stockton-Hazelton site by summer 2021, but is currently continuing monitoring operations. A new site has been identified and is currently in lease negotiations. CARB is planning to shutdown the Visalia-Church St. as soon as possible and is currently searching for a new site location. Please work with EPA on these upcoming system modifications

- [Item 17] Some design values in Table 17 appear to exclude data that SJVAPCD notes are affected by exceptional events (i.e. the Bakersfield MSA annual 2017-2019 DV is 16.9 µg/m³). The Bakersfield MSA currently meets the requirement, but please update this information in future plans.

- [Item 21] Table 20 is missing information on NAAQS comparability for the Visalia-Church St and Bakersfield-California PM_{2.5} FRM monitors. (This information is included in the detailed site tables). Please update in next year's plan.
- [Item 49] The Parlier site is operational and meeting this requirement. The replacement Arvin monitor is yet to be operational. Since the PAMS replacement site in Arvin is yet to be approved and operational (Item 7), the Bakersfield-Muni site temporarily serves as one of the two RA40 sites until the Arvin NO₂ monitor is reestablished.
- [Item 57] The Bakersfield-Westwind near-road NO₂ monitoring is established, but currently not operational due to instrumentation issues as a result of nearby construction. Please work with EPA on resuming operations at this site as soon as possible.